

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

JASON STELL,

Plaintiff,

v.

**CARRINGTON MORTGAGE
SERVICES, LLC.**

Defendants.

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CIVIL ACTION NO. 3:25-cv-00040

PLAINTIFF'S DESIGNATION OF EXPERTS

Plaintiff Jason Stell hereby designates the following individual as an expert witness who may be called to testify at the time of trial of this matter pursuant to Federal Rule of Civil Procedure 26(a)(2):

1. Identity of the expert witness:

Robert C. Vilt - JD, CPA
Vilt Law, P.C.
5177 Richmond Avenue, Suite 1142
Houston, Texas 77056
Telephone: 713.840.7570
Facsimile: 713.877.1827
Email: clay@viltlaw.com

2. Subject matter of expert testimony:

Mr. Vilt will provide testimony concerning the reasonableness of the attorneys' fees incurred by the Plaintiff to prepare and prosecute the instant lawsuit as well as in opposition to any legal fees claimed by the Defendant. Enclosed herewith is a copy of Mr. Vilt's current resume.

Plaintiff designates any and all expert witnesses that have been designated by other parties.

Plaintiff reserves the right to elicit any expert opinion or lay opinion testimony from any of the individuals previously identified by any other party as persons with knowledge of facts relevant to this proceeding, which testimony would be truthful, would be of benefit to the court and/or the jury determining the factual issues in this lawsuit, and which would not violate any existing Court order, the Federal Rules of Civil Procedure, or the Federal Rules of Evidence.

Plaintiff also reserves the right to call as an expert witness any of the expert witnesses designated by any other party in this case. Plaintiff further reserves the right to supplement this designation with additional designations of experts within the time limits imposed by the Court or any alternations of same by subsequent Court order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

Plaintiff reserves the right to withdraw the designation of any expert and to aver that any such previously designated expert will not be called as a witness at trial, and to redesignate same as a consulting expert, who cannot be called by opposing counsel.

Respectfully submitted,

VILT LAW, P.C.

By: /s/ Robert C. Vilt

Robert C. Vilt

Texas Bar No. 00788586

S.D. Bar No. 20296

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Houston, TX 77056

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on June 03, 2025 the foregoing was filed with the Court via the CM/ECF system and that the Clerk of the Court will forward a copy of same to the following CM/ECF users:

Melissa Gutierrez Alonso
Jessie Manzewitsch
Bradley Arant Boult Cummings, LLP
600 Travis St., Ste. 5600
Houston, Texas 77002

By: /s/ Robert C. Vilt
ROBERT C. VILT